

WALL-WOLFF LLC
299 BROADWAY, SUITE 800
NEW YORK, N.Y. 10007

TEL. (212) 920-0257
mwallwolff@wallwolff.com

September 28, 2022

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

Re: *United States v. Norman Gray, 21 CR 713 (LGS)*

Dear Judge Schofield:

I represent Norman Gray in the above-captioned case. With the consent of the government and Pretrial Services, I write to request a modification of certain conditions of Mr. Gray's pretrial release.

The original conditions of Mr. Gray's pretrial release included: (1) a \$250,000 personal recognizance bond co-signed by two financially responsible persons and secured by Mr. Gray's residence and \$50,000 in cash; (2) supervision by Pretrial Services; (3) home detention with location monitoring as directed by Pretrial Services; (4) passport surrender with no new applications for international travel documents; (5) travel restricted to the Southern and Eastern Districts of New York and the District of Connecticut; (6) no contact with victims, witnesses, or alleged co-conspirators; (7) no opening of any new bank accounts, credit cards, or lines of credit without the approval of Pretrial Services; (8) no solicitation of money from non-family members; and (9) no participation in any capital raises by his biotech company. On December 22, 2021, the Court modified Mr. Gray's pretrial release conditions to remove home detention and place him on a curfew with GPS monitoring. On May 25, 2022, the Court modified Mr. Gray's pretrial release conditions to add the District of Massachusetts and the District of Rhode Island to his authorized districts of travel.

Mr. Gray has been fully compliant with all of his conditions since he was released on bail. Due to the nature of Mr. Gray's work schedule, laboratory work, and increasingly frequent

Hon. Lorna G. Schofield

Page 2

travel requirements for employment purposes, I respectfully request that his conditions of release be modified to permit travel throughout the continental United States for work purposes with the prior authorization of Pretrial Services, and that such visits allow for overnight stays. All other conditions would remain the same, and any travel would be approved in advance by his supervising officer. The parties agree that such a modification would allow Mr. Gray to meet his work responsibilities while still remaining within the supervision of Pretrial Services.

Thank you very much for your consideration of this request.

Respectfully submitted,

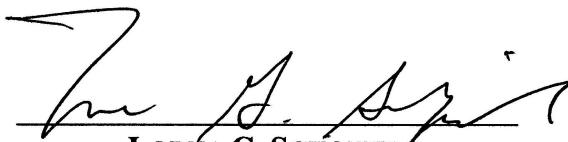
/s/ Megan Wall-Wolff
Megan Wall-Wolff

Attorney for Norman Gray

CC: AUSA Ben Gianforti

Application Granted. Defendant's conditions of release are hereby modified to permit travel throughout the continental United States for employment purposes with the prior authorization of Pretrial Services, and that such visits allow for overnight stays. All other conditions shall remain in effect and any travel shall be approved in advance by Pretrial Services. The Clerk of the Court is directed to terminate the letter motion at docket number 45.

Dated: September 29, 2022
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE